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Attorney for Defendant JUAN LUIS SOSA TAMAYO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, : Case No. 2:20-cr-00194-JAD-DJA

Plaintiff,

v.

JUAN LUIS SOSA TAMAYO et. al,

Defendants.

**STIPULATION TO CONTINUE
SENTENCING**

2nd Request

IT IS HEREBY STIPULATED AND AGREED, by and between Eric C. Schmale, Assistant United States Attorney, counsel for the United States (hereinafter “the Government”), and Thomas F. Pitaro, counsel for defendant Juan Sosa Tamayo (collectively, “the Parties”), that the sentencing scheduled for February 27, 2023, at 3:00 p.m., be vacated to a date and time convenient to the court, but on or after April 3, 2023.

The Stipulation is entered into for the following reasons:

1. The additional time requested herein is not sought for purposes of delay.
2. Counsel Thomas Pitaro, attorney for Juan Sosa Tamayo, needs additional time to prepare for sentencing.
3. Counsel has spoken to Defendant and he has no opposition to the continuance.

1 4. Counsel has spoken to the Government and he has no opposition to the
2 continuance.

3 5. The parties agree to the continuance.

4 6. The additional time requested herein is not sought for purposes of delay, but
5 merely to allow counsel for defendants sufficient time within which to be able to effectively
6 prepare for sentencing, taking into account the exercise of due diligence.

7 7. Denial of this request for continuance would deny counsel for sufficient time to
8 effectively represent the defendant.

9 This is the second Stipulation to continue the sentencing and related dates in this matter.

10 DATED: This 10th day of February 2023.

11 PITARO & FUMO, CHTD.

12 JASON M FRIERSON
13 UNITED STATES ATTORNEY

14 By /s/ Thomas Pitaro
15 THOMAS F. PITARO
16 Counsel for Defendant Juan Sosa Tamayo

17 By /s/ Eric Schmale
18 Eric C. Schmale
19 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, : Case No. Case No. 2:20-cr-00194-JAD
:
Plaintiff, :
:
v. : **ORDER**
JUAN LUIS SOSA TAMAYO et. al, :
:
Defendants. :
:

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The additional time requested herein is not sought for purposes of delay.
2. Counsel Thomas Pitaro, attorney for Juan Sosa Tamayo, needs additional time to prepare for sentencing.
3. Counsel has spoken to Defendant and he has no opposition to the continuance.
4. Counsel has spoken to the Government and he has no opposition to the continuance.
5. The parties agree to the continuance.
6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendants sufficient time within which to be able to effectively prepare for sentencing, taking into account the exercise of due diligence.
7. Denial of this request for continuance would deny counsel for sufficient time to effectively represent the defendant.

1 This is the second Stipulation to continue the sentencing and related dates in this matter.

2 **ORDER**

3 **IT IS THEREFORE ORDERED** that the sentencing currently set for February 27,
4 2023 at 3:00 p.m., is vacated and continued to April 10, 2023, at 3:00 p.m.
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6 DATED this 17th day of February, 2023.

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9 UNITED STATES DISTRICT JUDGE
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